1 JONATHAN O. PENA, ESQ. CA Bar ID No. 278044 2 Peña & Bromberg, PLC 3 2440 Tulare St., Suite 320 Fresno, CA 93721 Telephone: 559-412-5390 Fax: 866-282-6709 5 info@jonathanpena.com 6 Attorney for Plaintiff 7 UNITED STATES DISTRICT COURT 8 EASTERN DISTRICT OF CALIFORNIA 9 10 Case No. 1:20-cv-01181-EPG ENRIQUETA VEGA DE CENDEJAS, 11 STIPULATION AND ORDER FOR Plaintiff, EXTENSION OF TIME 12 VS. (ECF No. 21) 13 KILOLO KIJAKAZI, ACTING 14 COMMISSIONER OF SOCIAL SECURITY, 15 Defendant. 16 17 18 19 20 IT IS HEREBY STIPULATED, by and between the parties through their respective 21 counsel of record, with the Court's approval, that Plaintiff shall have a 2-day extension of time, 22 from September 22, 2021 to September 24, 2021, for Plaintiff to serve on defendant with 23 PLAINTIFF'S OPENING BRIEF. All other dates in the Court's Scheduling Order shall be 24 extended accordingly. 25 This is Plaintiff's second request for an extension of time. Good cause exists for this 26 short two-day extension. Counsel has recently received a greater number of Answers and 27 Certified Administrative Records from defendant in cases in this district, and the three other 28 California Districts, each of which require settlement negotiations or merit briefing. Counsel has

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1	a greater than usual number of merit briefs due in September 2021. However, a two-day
2	extension will allow Counsel to brief the issues thoroughly for the Court's consideration.
3	Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and
4	Court for any inconvenience this may cause.
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6	Respectfully submitted,
7	Dated: September 20, 2021 PENA & BROMBERG, ATTORNEYS AT LAW
8	
9	By: <u>/s/ Jonathan Omar Pena</u> JONATHAN OMAR PENA
10	Attorneys for Plaintiff
11	
12	Dated: September 20, 2021 PHILLIP A. TALBERT
13	Acting United States Attorney DEBORAH LEE STACHEL
14	Regional Chief Counsel, Region IX
15	Social Security Administration
16	Day */-/ O C1 1- 11
17	By: */s/ Oscar Gonzalez de Llano Oscar Gonzalez de Llano
18	Special Assistant United States Attorney Attorneys for Defendant
19	(*As authorized by email on September 20, 2021)
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## **ORDER**

Based on the above stipulation (ECF No. 21), IT IS ORDERED that Plaintiff shall serve Defendant with Plaintiff's Opening Brief no later than September 24, 2021. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: September 21, 2021

/s/ Encir P. Story
UNITED STATES MAGISTRATE JUDGE